IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

|) |
|---------------------|
| |
| |
| CIVIL ACTION NO. |
| |
| |
| |
| |
| |
| JURY TRIAL DEMANDED |
| |
| • |
| |
| |
| |
| |

AFFIDAVIT OF DR ALLEN KEITH WESLEY M.D., FACEP, FAEMS

STATE OF WISCONSIN

COUNTY OF EAU CLAIRE

BEFORE ME, the undersigned authority duly authorized to administer oaths and to take acknowledgment personally appeared, Dr. Allen Keith Wesley, who after first duly sworn states as follows:

- My name is Dr. Allen Keith Wesley, and I am a medical doctor licensed to practice in both Wisconsin and Minnesota. I am board certified in both Emergency Medicine and Emergency Medical Services by the American Board of Emergency Medicine.
- 2. I have been actively practicing extensively in the emergency medical services field as a medical director for over 34 years.
- 3. I have served as both the Minnesota and Wisconsin State EMS Medical Director during which I approved policies and procedures for the out of hospital care of attempted suicides and hangings.
- 4. I have served as the Medical Director for both urban and suburban EMS agencies for which I have approved policies and procedures for the out of hospital care of attempted suicide and hangings.
- 5. I have been certified by the American Heart Association to instruct CPR and Advanced Cardiac Life Support course which directly relates to the care of attempted suicides and hangings.
- 6. I am the Medical Advisor of an Emergency Medical Responder textbook, which is now in its 12th edition.
- 7. I have been qualified as an expert in Emergency Medical Services in 18 court cases and have never had my expert opinion disqualified.
- 8. I am very familiar with the standard of care of emergency medical professionals responding to victims of hanging and cardiac arrest.

- These standards of care are promulgated by the American Heart Association.
- b. These standards of care call for the performance of CPR in a competent manner by the highest trained individuals at the scene of an emergency.
- c. These standards of care call for the delivery of an AED to the scene of a cardiac arrest as quickly as possible.
- d. These standards of care call for ensuring a victim has a patent airway and when possible, the delivery of 100% supplemental oxygen.
- 9. My expert opinion herein is based on review of the following series of documents and information regarding Mr. Kendall and the events surrounding his care, treatment at the Fulton County Jail;
 - a. NaphCare Medical Records
 - b. NaphCare Psychiatric Progress Notes
 - c. Kendall Suicide Report
 - d. Medical Examiner Report
 - e. Kendall History and Event Timeline
 - f. American Heart Association Guidelines for cardiac arrest resuscitation.
- 10. Further, my opinions expressed in this Affidavit are based upon the following facts, which I have been asked to assume as true and which are

supported by the above-referenced records, medical records and/or other documents:

- a. On February 1, 2021, NaphCare, Inc. (hereinafter "NaphCare") had
 two employees on duty in the Fulton County jail, Michael Agyei, PA C, and Edith Nwanko-RN.
- b. On February 1, 2021, Michael Agyei, PA-C, and Edith Nwanko-RN received an emergency call for medical assistance for an attempted suicide/hanging of an inmate within the jail..
- c. On February 1, 2021, there was the relatively short period during which Shane Kendall (hereinafter "Mr. Kendall") could have attempted suicide according to the jail logbooks detailing the times of security rounds.
- d. Upon learning of Mr. Kendall's medical emergency on February 1, 2021, NaphCare. and/or its employees failed to respond in a timely manner.
- e. Upon learning of Mr. Kendall's medical emergency, NaphCare and/or its employees failed to respond with proper medical equipment in a timely manner.
- f. Upon learning of Mr. Kendall's medical emergency on February 1, 2021, NaphCare Inc. and/or employees failed and/or <u>refused</u> to provide basic life support/CPR.

- 10. Based upon my review of the foregoing, and as a result of my education, training and experience, I have appropriate levels of knowledge about and significant familiarity with the proper emergency response required to patients like or similar to Mr. Kendall in February, 2021, I am knowledgeable and competent to testify that in my opinion, within a reasonable degree of medical certainty, that NaphCare and/or its employees breached their duty of care and fell below the accepted standard of care during their interaction with Mr. Kendall on February 1, 2021, while responding to his medical emergency. More specifically, NaphCare and/or its employees breached their duty of care to Mr. Kendall by:
 - a. Failing to deliver an AED to the scene in a timely manner. In the
 context of a recent suicide attempt by hanging, the use of an AED
 during Mr. Kendall's resuscitation would have been critical to his
 survival;
 - b. **Refusing to perform CPR**. When Edith Nwankwo, RN, deliberately refused to provide CPR to Mr. Kendall, she recklessly and negligently avoided taking her proper role in Mr. Kendall's resuscitation, which calls for CPR to be provided by the highest trained individual present;
 - c. Performing CPR in such an incompetent manner as to be
 removed from the resuscitation by jail staff. When Michael Agyei,
 PA-C, who arrived on the scene of Mr. Kendall's emergency

considerably late (more than 15 minutes after CPR had been initiated by jail staff) and in a "disoriented state." It was noted by jail staff that Michael Agyei, PA-C, performed CPR with such poor technique that he was removed from the chest compression rotation;

- d. Failing to administer establish a patent airway and administer 100% oxygen. Owing to the relatively short period during which Mr.
 - Kendall could have attempted suicide and based on the lack of significant neck trauma and obvious signs of death along with the documented failure to see chest rise with CPR; the NaphCare providers were negligent in failing to ensure Mr. Kendall had a patent airway and administering 100% oxygen which was critical to his successful resuscitation.
- e. Providing untruthful written narratives to Fulton County Sheriff regarding their own response to Mr. Kendall's medical emergency.
- 11.I am of the opinion that had NaphCare and/or its employees performed their duties in accordance with the standard of care and provided the appropriate basic life support to him, within a reasonable time frame, the risk of anoxic brain injury would have been significantly reduced and Mr. Kendall could have been revived and survived.
- 12.I am of the further opinion that the above-referenced deviations from the accepted standard of care proximately caused and/or significantly

- 13.I may amend or have additional opinions once provided additional materials.
- 14. This Affidavit is being provided by me in order to comply with the requirements of O.C.G.A. § 9-11-9.1 and for such other purposes as allowed by applicable law.
- 15.I have not been found guilty of fraud or perjury in any jurisdiction.
- 16.I have no financial interest in the outcome of any claim that may be pursued by the estate of Mr. Kendall regarding this matter.
- 17.Under penalties of perjury, I declare that I have read the foregoing affidavit and that the facts stated herein are true and correct to the best of my knowledge.

Aften Keith Wesley, M.D., FACEP, FAEMS

taken, Acknowledged and Subscribed before me this 30 day of 30, 203.3

My Commission Expires: 11/9/26

Sunse Sheunur

Notary Public

DENISE M. SHANNON SHANNON TO SHAN

r englishik tika sa sa sakabadan liber kalipta basa

American in the contract of the action of the visit of the contract of the con

lien ja kilonina ja ja kilonin kilonin kalendaria kai kan laina kalendaria kalendaria.

navani suka ajun khawa na makhaka katik

and a single conservation of the conservation

a gravity that is the following that there is a first property to the gravity of the contraction of the cont

and the tip for the management of the term of the problem.

Case 1:23-cv-00416-JPB-WEJ Document 15-3 Filed 03/16/23 Page 9 of 19

Curriculum Vitae A. Keith Wesley, MD FACEP

Vital Statistics

Born: September 10, 1959, Ft. Lee, Virginia

Hometown: Tyler, Texas

Residence: E2965 Benrud Lane

Eau Claire, WI

Education

College: Brigham Young University, Provo Utah

B.S. Zoology (Premed), July 1977 - April 23, 1982

Medical: Baylor College of Medicine, Houston Texas

M.D., July 15, 1982 - May 23, 1986

Residency: Methodist Hospital of Indiana, Indianapolis Indiana

Emergency Medicine, June 23, 1986 - June 30, 1989

Work Experience

04/30/04 – 6/26/20 HealthEast Medical Transportation

Medical Director of EMS St. Paul, Minnesota

02/01/94 – 04/30/04 Chippewa Valley Emergency Care

Director, EMS Education Sacred Heart Hospital Eau Claire, Wisconsin

07/15/89 - 01/31/94 Southern Wisconsin Emergency Associates

Assistant Medical Director of EMS

Mercy Hospital Janesville, Wisconsin

Licensure & Certifications

Medical Licenses: Wisconsin #30343

Minnesota #40525

Board: American Board of Emergency Medicine

March 8, 1991, recertified December 31 2001, December 31, 2013, Certificate 890150

Fellow: American College of Emergency Physicians

October 1, 1993, recertified January 1, 2002, January 1, 2012

Sub-Specialty: American Board of Emergency Medicine

EMS Sub-specialty October 2013

Professional Associations

National Association of EMS Physicians

American College of Emergency Physicians

National Association of EMS Management

Minnesota Ambulance Association

National Associations of EMS Educators

National Association of EMTs

National Association of State EMS Officials

Society for Academic Emergency Medicine

EMS Appointments

| VIS F | Appointments | |
|-------|--------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| | 02/01/08 - 6/26/20 | Medical Director, M Health Fairview EMS (MHF EMS) formally HealthEast Medical Transportation, St. Paul MN |
| | 2007 - 2010 | Minnesota State EMS Medical Director |
| | 2006 - 2008 | Wisconsin State EMS Medical Director |
| | 2006 - 2008 | Chair, National Council of State EMS Medical Directors |
| | 2005 - 2006 | Wisconsin EMS Advisory Board to DHFS EMS Section |
| | 2007 – Present | Medial Director, United EMS Wisconsin Rapids, WI |
| | 2005 – 2015 | Medical Director Eau Claire Regional SWAT Team |
| | 2006 – 2012 | Medical Director Ashland-Bayfield EMS |
| | 2006 – 2012 | Medical Director Apostle Island National Park |
| | 2005 – 2012 | Medical Director Chippewa Fire District, Chippewa Falls, WI |
| | 2001 - 2004 | Assistant Medical Director: Eau Claire Police Department Tactical Response Team |
| | 2000 – 2004 | Medical Director Colfax Rescue, Colfax Wisconsin |
| | 1993 - 2004 | EMS Physician Advisory Committee Wisconsin Bureau of EMS & Injury Prevention Dept. of Health and Family Services (Chair since 2001) |
| | 1994 - 2004 | Medical co-Director Eau Claire County EMS, Eau Claire Wisconsin |
| | 1994 - 2003 | Medical co-Director Eau Claire County EMS, Eau Claire Fire Department, Eau Claire Wisconsin |
| | 1996 - 2003 | Medical Director West Central Wisconsin HAZMAT Response Team |
| | 1994 - 2004 | Medical Director Eau Claire County 911 Communications Center |
| | 1996 - 2000 | Medical Director West Central Wisconsin HAZMAT Response Team |
| | 1998 - 1999 | Medical Director Trempealeau County 911 Communications Center, Osseo Wisconsin |
| | 1995 - 2003 | Medical Advisor Wisconsin EMS Association |
| | 1997 - 1998 | Chairman, EMS Committee Wisconsin Chapter, American College of Emergency Physicians |
| | 1989 - 1993 | Medical Director Milton EMS, Milton Wisconsin |
| | 1989 - 1993 | Assistant Medical Director Janesville Fire Department, Janesville Wisconsin |
| | | |

| Case 1:2 | 3-cv-004 | 16-JPB-WEJ Document 15-3 Filed 03/16/23 Page 11 of 19 |
|----------------|--------------------|---------------------------------------------------------------------------------------------------------------|
| 2014 - | - 2020 | Adjunct Assistant Professor, Department of Emergency Medicine, University of Minnesota School of Medicine |
| 1999 - | - 2007 | Physician Site Reviewer Committee on Accreditation of Education Programs For the EMT-Paramedic (formally JRC) |
| 1994 - | - 2004 | Medical Director, EMS Education Sacred Heart Hospital, Eau Claire WI |
| 1995 | - 1997 | Enhanced EMT-Intermediate Curriculum Committee Wisconsin EMS Advisory Board |
| 1994 | - 1999 | Medical Director, EMS Education Chippewa Valley Technical College, Eau Claire, WI |
| 1994 - | - 2004 | Clinical Assistant Professor, University of Wisconsin Family Practice Residency, Eau Claire, Wisconsin |
| Other Appoints | ments | |
| - | – Present | National Academy of Ambulance Coding – Advisory Board |
| 2007 - | – Present | JEMS Magazine Editorial Advisory Board, |
| 2006 - | – Present | National EMS Museum Advisory Board |
| 2005 - | - 2007 | Board of Directors – Cyanide Poisoning Treatment Coalition |
| 2003- | 2005 | Editorial Board, Journal of EMS Management, National Association of EMS Managers |
| 2002- | 2005 | Editorial Board, Merginet.com, On-line EMS Magazine |
| 2002 | - 2005 | Wisconsin Mediation Board, Peer Review Panel |
| 2002 | - 2007 | Chair, Membership Committee, National Association of EMS Physicians |
| Speaker Burea | us & Const | alting Relationships |
| 2009 - | - Present | Nonin Medical |
| 2009 - | - 2011 | Advanced Circulatory Systems Inc. |
| 2007- | 2009 | Dey, L.P. Cyanokit |
| 2007- | 2009 | IZ-IO |
| 2000- | 2009 | Emergent Respiratory Products, Port-O-Vent CPAP |
| Publications | | |
| Textbooks: | | |
| 2016 | Huszar' | s ECG and 12-Lead Interpretation, 5 th ed., Wesley, Elesevier |
| 2008 | Huszars | Basic Dysrhythmias and Interpretation and Management 4 th ed, , Wesley, Elsevier |
| 2020 | | sponder 11 th ed., Bergeron, Bizjak, Le Boudour, Wesley; Brady |
| 2016 | First Re | sponder 10 th ed. , Bergeron, Bizjak, Le Boudour, Wesley; Brady |
| 2012 | First Re | sponder 9th ed., Le Boudour, Wesley; Brady |
| 2008 | First Re | sponder 8 th ed., Bergeron, Bizjak, Le Boudour, Wesley; Brady |
| 2005 | Fast & 1 | Easy ECGs: A Self Paced Program, Bruce Shade/Keith Wesley, McGraw-Hill |
| 2003 | Parame | lic and Intermediate Preparation and Review Manual, Dan Mack/Keith Wesley, Mosby |
| 2002 | Review Shade, l | ed and corrected drug dosages and calculations, EMT-Intermediate Textbook, 2 nd edition, Mosby |
| 2002 | Review | er, ACLS Interactive CD-ROM, Bannon, Mosby |
| 2001 | Review | er, Prehospital Drug Therapy, 2 nd edition, Gonsoulin et al, Mosby |

Case 1:23-cv-00416-JPB-WEJ Document 15-3 Filed 03/16/23 Page 12 of 19

Reviewer, EMT Prehospital Care 3rd edition, Halley, Mosby 2001 2000 Contributor, Paramedic Workbook, Saunders, Mosby 2000 Chapter 13: Geriatric Trauma PHTLS Textbook 2nd edition Reviewer, ACLS Quick Review Study Guide 2nd edition, Aehlert, Mosby 2000 2000 Reviewer, EMT-B Certification Preparation and Review 2nd edition, Nagell, Mosby Reviewer, EMT-Basic Text, 4th edition, Lockhart, Mosby 2000 2000 Reviewer, 4th Edition, Mosby's Paramedic Texbook, Instructor's Manual and Student Handbook 1999 Reviewer, EMT-Intermediate Text, McSwain, Mosby 1997 Enhanced EMT-Intermediate Pilot Curriculum Wisconsin EMS Section, Dept. of Health and Family Services 1995 Editor in Chief, Wisconsin EMS Medical Directors Handbook Wisconsin EMS Section, Dept. of Health and Family Services

Abstracts:

(2020) Abstracts for the 2020 NAEMSP Scientific Assembly, Prehospital Emergency Care, 24:1, 100-156, DOI:

Discordant Perceptions of Care between Transgender Patients and Emergency Medical Services (EMS) Providers, Eli Bevis, MJ Zappa, Marshall Washick, Allen Wesley; *HealthEast Medical Transportation*

Survey of Minnesota Emergency Medical Services (EMS) Providers Reveals Challenges on Acceptance of Transgender Patient Care Education, MJ Zappa, Eli Bevis, Marshall Washick, Allen Wesley, *HealthEast Medical Transportation*

(2019) Abstracts for the 2019 NAEMSP Scientific Assembly Pages 97-152 | Received 04 Sep 2018, Accepted 05 Sep 2018, Accepted author version posted online: 15 Sep 2018, Published online: 14 Nov 2018

Adenosine Triphosphate (ATP) Bioluminescence Surveillance of Standardized Protocol Effectiveness on Ambulance Cleanliness Mitchell Butterbaugh, Marshall Washick, Keith Wesley, Prasanthi Govindarajan, HealthEast Medical Transportation

(2010) Abstracts for the 2010 NAEMSP Scientific Assembly Pages 1-56 | Published online: 30 Nov 2009

Method of End-Tidal Carbon Dioxide Monitoring Affects Accuracy While Administering Continuous Positive Airway Pressure Marshall Washick, Keith Wesley, HealthEast Medical Transportation

Papers:

Kenneth A. Williams, Brendan C. Berry, Allen Yee, A. Keith Wesley, Kevin Sirmons, Benjamin J. Lawner & on behalf of NASEMSO, AMPA, and NAEMSP (2020) Code of Ethics for EMS Physician Medical Directors, Prehospital Emergency Care.

Avasarala J, Wesley K. Optimization of acute stroke care in the emergency department: a call for better utilization of healthcare resources amid growing shortage of neurologists in the United States. *CNS Spectr*. 2018;23(4):248-250.

Adabag S, Hodgson L, Garcia S, et al. Outcomes of sudden cardiac arrest in a state-wide integrated resuscitation program: Results from the Minnesota Resuscitation Consortium. *Resuscitation*. 2017;110:95-100.

Garcia S, Drexel T, Bekwelem W, et al. Early Access to the Cardiac Catheterization Laboratory for Patients Resuscitated From Cardiac Arrest Due to a Shockable Rhythm: The Minnesota Resuscitation Consortium Twin Cities Unified Protocol. *J Am Heart Assoc*. 2016;5(1):e002670. Published 2016 Jan 7.

Widmeier K, Wesley K. Infection detection: Identifying & understanding sepsis in the prehospital setting, part 1 of 2. *JEMS*. 2014;39(1):34-37.

Burnett AM, Wesley K, Page D, Washick M. "Pre-hospital intubation is associated with increased mortality after traumatic brain injury". *J Surg Res.* 2013;179(1):183.

Lu DW, Guenther E, Wesley AK, Gallagher TH. "Disclosure of harmful medical errors in out-of-hospital care." Ann Emerg Med. 2013 Feb; 61(2):215-21.

Case 1:23-cv-00416-JPB-WEJ Document 15-3 Filed 03/16/23 Page 13 of 19

Cunningham CA, Wesley K, Peterson TD, et al. The role of state medical direction in the comprehensive emergency medical services system: a resource document. *Prehosp Emerg Care*. 2010;14(3):404-411.

Myers JB, Slovis CM, Eckstein M, et al. Evidence-based performance measures for emergency medical services systems: a model for expanded EMS benchmarking. *Prehosp Emerg Care*. 2008;12(2):141-151.

Bledsoe BE, Wesley AK, Eckstein M, Dunn TM, O'keefe MF. "Helicopter Scene Transport of Trauma Patients with Nonlife-Threatening Injuries: A Meta-Analysis." J Trauma. 2006 Jun;60(6):1257-1266.

Wesley AK. Improving the hemodynamics of CPR. AHA guidelines support timely and effective CPR. *Emerg Med Serv.* 2006;35(3):82-92.

Bledsoe B, Braude D, Dailey MW, Myers J, Richards M, Wesley K. Simplifying prehospital analgesia. Why certain medications should or should not be used for pain management in the field. *JEMS*. 2005;30(7):56-63.

"NAEMSP Position Paper: High-Dose Steroids for Acute Spinal Cord Injury in Emergency Medical Services" B. Bledsoe, AK Wesley, Volume 8, Number 3/July-September 2004

Alonso-Serra HM, Wesley K; National Association of EMS Physicians Standards and Clinical Practices Committee. Prehospital pain management. *Prehosp Emerg Care*. 2003;7(4):482-488.

Wesley K. Without warning. How to effectively treat patients with excited delirium. JEMS. 2011;36(2):48-55.

"Selective spinal immobilization." Wesley K., Emerg Med Serv. 2004 May;33(5):99-102, 104-6.

Journal of EMS Columns

Wesley K, Wesley K. Vital Handoffs: Do we give complete, high-quality reports when transferring care?. *JEMS*. 2017;42(5):23.

Wesley K, Wesley K. EMS Vs. Police Transport: Should we allow police officers to transport trauma patients?. *JEMS*. 2017;42(2):29.

Wesley K, Wesley K. Pediatric Pain: Evaluating prehospital opioid pain management in children. *JEMS*. 2017;42(3):25.

Wesley K, Wesley K. DEXTROSE DOSING. JEMS. 2016;41(6):18.

Wesley K, Wesley K. INCIDENT REHAB. JEMS. 2016;41(5):23.

Wesley K, Wesley K. MOVIE MAGIC. JEMS. 2016;41(4):18.

Wesley K, Wesley K. ALS VS. BLS. JEMS. 2016;41(1):28.

Wesley K, Wesley K. Pit Crew Proof. Study shows CPR method has better survival rates. *JEMS*. 2016;41(8):24-25.

Wesley K, Wesley K. STROKE RECOGNITION. Lower the threshold for stroke alert activation. *JEMS*. 2016;41(2):22.

Wesley K, Wesley K. Hands-On Defibrillation: Is an AED shock safe during compressions?. *JEMS*. 2016;41(11):23.

Wesley K, Wesley K. QUALITY OF VIEW. Video laryngoscopy improves intubation success rate. *JEMS*. 2016;41(3):22.

Wesley K. Face Saver. Better options for cooling. JEMS. 2016;41(8):20-21.

Wesley K, Wesley K. Backboard Blues. Study says long spine boards may not be worth the trouble. *JEMS*. 2016;41(7):44.

Wesley K, Wesley K. GCS CONTROVERSY. JEMS. 2015;40(11):25

Wesley K, Wesley K. ABSENT ASPIRIN. JEMS. 2015;40(5):28.

Wesley K, Wesley K. DNR CONFUSION. POLST interpretation lacks consensus among prehospital providers. *JEMS*. 2015;40(6):28

Wesley K, Wesley K. ABUSE BARRIER. Providers don't know when to report child abuse. *JEMS*. 2015;40(7):36.

Wesley K, Wesley K. NITRO EFFECTS. Study assesses nitroglycerin's risk of hypotension in STEMI patients. *JEMS*. 2015;40(12):25.

Wesley K, Wesley K. TRIAGING GERIATRICS. 110 is the new 90 for systolic blood pressure in elderly patients. *JEMS*. 2015;40(10):29.

Wesley K, Wesley K. Give them the epinephrine: Pediatric anaphylaxis management in the prehospital setting. *JEMS*. 2014;39(1):26.

Wesley K, Wesley K. Getting burned. Holes in burn victim study negate prehospital blame. JEMS.

Case 1:23-cv-00416-JPB-WEJ Document 15-3 Filed 03/16/23 Page 14 of 19

2014;39(12):27.

Wesley K, Wesley K. Stroke savvy. The accuracy of EMS-reported last known normal times. *JEMS*. 2014;39(9):27.

Wesley K, Wesley K. Intubation alternative. JEMS. 2014;39(3):23.

Wesley K, Wesley K. Monitoring shock. JEMS. 2014;39(6):30.

Wesley K, Wesley K. A commonsense review. JEMS. 2014;39(2):32.

Wesley K, Wesley K. End-of-life care. JEMS. 2014;39(7):32.

Wesley K, Wesley K. Ineffectiveness of the precordial thump. Outdated practice doesn't save lives. *JEMS*. 2014;39(10):25.

Wesley K, Wesley K. Trauma overtriage. Who should pay the bill? *JEMS*. 2014;39(4):24.

Wesley K, Wesley K. Clean hands. JEMS. 2014;39(8):26.

Wesley K. The argument for BLS CPAP. JEMS. 2013;38(11):40-43.

Wesley K, Wesley K. Spinal immobilization. Can we throw away our backboards yet?. *JEMS*. 2013;38(11):30-31.

Wesley K. Pump problems. JEMS. 2012;Suppl:8-11.

Journal of EMS "What's Up Doc" column:

"No silver bullet cardiac arrest survival depends on numerous strategies." Wesley K., JEMS. 2010 Jul;35(7):36, 38

"PRIMED for failure? What the ROC PRIMED study should tell us about clinical trials and the way forward in reducing the toll of out-of-hospital cardiac arrest." Wesley K., EMS Mag. 2010 May;39(5):46-50.

"To err is human. Creating a 'just culture' to alter behavior & reduce medical errors." Wesley K., JEMS. 2009 Jul;34(7):44, 46

"Buying time: making the case for pacing a hypoperfusive DNR patient." Steines T, Wesley K., JEMS. 2009 Apr;34(4):30-1

"Write it right keeping your PCR clinical & factual." Wesley K., JEMS. 2008 Apr;33(4):42-4.

"Nasal medications. A delivery method long overdue." Fowler RL, Wesley K. JEMS. 2007 Oct;32(10):S33.

"The 'basic' skill of CPAP. Adding CPAP to the EMT-B scope of practice." Wesley K., JEMS. 2007 Oct;32(10):S21-2.

"Hey, doc! Is anybody listening?" Wesley K., JEMS. 2005 Jul;30(7):20

Wesley, Prehospital Emergency Care; October/December 2003 vol. 7 num. 4

"Hey, Doc! Just another detox?" Wesley K., Emerg Med Serv. 2002 Jul;31(7):28.

Wisconsin State EMS Journal:

"Mask CPAP", EMS Professionals, May-June 2003

"Selective Spinal Immobilization", EMS Professionals, Nov-Dec 2002

"Benchmarking EMS", EMS Professionals, May-June 2001

"Pain – Understanding it and Treating it", EMS Professionals, Jan-Feb 2001

"Latex Allergies and the EMT", EMS Professionals, Nov-Dec 2000

"Pilot Testing Wisconsin's Enhanced Intermediate", EMS Professionals, Jan-Feb 1999

Bi-monthly "Hey Doc" column, EMS Professionals: Journal of the Wisconsin EMS Association since 1995 - 2004. (Titles available upon request)

Speaking Engagements

EMS Today 2016, Baltimore MD, Feb 19-21, 2016

"Ethical Challenges in EMS"

"Pre-hospital Analgesia"

Pierce County EMS Conference, Ellsworth WI, Feb 22, 2014

"Excited Delirium - A Freight Train to Death"

```
Inver Hills Community College EMS Conference, Feb 19 2014 
"Throw you Backboards Away"
```

EMS Today 2014, Washington DC, Feb 5-9, 2014

"CPAP – It's Basic"

"Excited Delirium - A Freight Train to Death"

Arrowhead EMS Conference, Duluth MN, January 25-30, 2014

DOT EMT Basic Instructor Course

"Rumbles and Grumbles – Abdominal Emergencies" "Shock"

DVFA Conference, Dover DE, Sept. 9-11, 2013

"CPAP for Everyone"

"Excited Delirium - A Freight Train to Death"

"Rumbles and Grumbles - Abdominal Emergencies"

"Here, Hold This - Tourniquets in EMS"

Iowa Code Three Conference, Cedar Rapids, IA, Marsh 22-23, 2013

"Carbon Monoxide - The Silent Killer"

"Pediatric Head Injuries"

"CPAP for Everyone – Lessons Learned"

EMS World, New Orleans, October 30-Nov 3, 2012

"Advanced Capnography"

"Oxygen Therapy"

"Lasix Kills"

Pennsylvania EMS Conference, August 17-18, 2012

"10 Most Important EMS Paper"

"High Performance CPR"

"EMS Medical Oversight"

Region III EMS Conference, Ruidoso NM, April 26-29, 2012

"All That Wheezes"

"Excited Delirium"

"EMS Professionalism"

Grand Junction CO Conference, Jan 27-28, 2012

"Excited Delirium Workshop"

"Keynote: Become an EMS Professional"

Arrowhead EMS Conference, Duluth, MN, Jan, 20-21, 2012

"Oxygen Therapy"

"Here, Hold This: Tourniquets"

EMS Trendsetters, Kenosha, WI, Nov. 3-5, 2011

"Shock"

"Getn' Old, Goin Slow"

"Be Excellent to Each Other"

"Excited Delirium"

"Rumbles and Grumbles"

EMS Conference, Gloucuster, PA, Oct 27th, 2011

"Excited Delirium"

Marshfield Trauma Conference, Marshfield WI, August 10th, 2011

"Advanced Capnography"

"ECG Basics for Basics

Arkansas Ambulance Association Conf., Little Rock AR, April 26-27, 2011

"Firefighter Rehab"

"Pain Management"

Iowa State EMS Conference, April 2, 2011

"Excited Delirium"

"Pediatric Head Injuries"

"Lasix Kills"

EMS Today, Baltimore MD, March 1-7, 2011

"Lasix Kills: New Therapies for Congestive Heart Failure"

"Grow Up: Become an EMS Professional"

"The Patient Care Narrative – What you never learned"

Long Hot Summer, St. Paul MN, Feb 25, 2011

"Top 10 Research Papers of 2010"

"Self Defense and Excited Delerium"

Arrowhead EMS Conference, Duluth MN, Jan 22-25 2011

```
"Excited Delirium - A Freight Train to Death"
```

"Pit Crew CPR - The 2010 AHA Guidelines"

"AMLS"

Bellingham EMS Conference, Bellingham WA, Oct 23-24 2010

"Become an EMS Professional"

"The 10 most important EMS Papers in 2010"

Clincon 2010, Orlando, Florida, July 1-3 2010

"Advanced capnography – its more than just a number"

"Lasix Kills - New Therapies for CHF"

"Excited Delirium - A Freight Train to Death"

"Here Hold this – Role of Tourniquets in EMS"

"The Patient Care Narrative – What you never learned"

Arkansas Ambulance Association Conference, Little Rock, AR, April 27-30 2010

"Fundamental of Quality Improvement"

"Selective Spinal Immobilization"

"Drug Facilitated Airway Management"

"Medical Direction"

"Excited Delirium - A Freight Train to Death"

Long Hot Summer, St. Paul MN, March 2010

"Excited Delirium - A Freight Train to Death"

EMS Expo, Oct 26-30, 2009, Atlanta, GA

"New Therapies for Congestive Heart Failure"

"Excited Delirium - A Freight Train to Death"

Oregon EMS Conference - Excellence in Education, Portland, OR, Oct 2-3, 2009

Pre-con "Evaluating EMS Literature"

"Understanding CHF"

"Pit Crew CPR"

Hong Kong Symposium on Emergency Medicine, Sept 25-26, 2009, Hong Kong, CN

"High Performance CPR and the role of the ResQPod"

What's Hot and What's Not in Trauma Care Conference, Stevens Point, WI, Aug 13, 2009

"Drug Facilitated Airway Management"

Colorado Symposium on Emergency Care, Telluride, CO, May 27-30, 2009

"Hey Hold This! Tourniquets and Hemostatic Agents"

"To Tube or not to Tube: That is the Questions"

"New Therapies for Congestive Heart Failure"

"All that Wheezes"

Keynote - "Become an EMS Professional"

Resuscitation Conference, Anchorage Alaska, May 6-9, 2009

"High Performance CPR"

Cook County EMS, Gran Marais, April 24-25, 2009

Keynote - "Become an EMS Professional"

"CPAP for Everyone"

"ECG for Basics"

"Not a Basic Airway"

Keynote – "Be excellent to one another"

South Carolina EMS Conference, Myrtle Beach, April 15-20, 2009

"ANS and EMS Pharmacology"

"Get Low Go Slow - Peds Emergencies and Science"

"Cyanide Poisoning – More Common than you think"

Long Hot Summer Conference, Minneapolis, MN, Feb 6, 2009

"Not a Basic Airway

Arrowhead EMS Conference, Duluth MN, January 20-26, 2009

"AMLS" course pre-con

"EMS Documentation"

"EMS Controversies"

Iowa EMS Conference, Dubuque, Iowa, November 13-14, 2008

"The Basics of Medical Direction"

"Developing a CQI Program"

EMS Expo, Las Vegas, NV, Oct 15-18, 2008

"Brain Attack"

"Excited Delirium"

"New Therapies for CHF"

Greater Northwest EMS Conference, Bemidji, MN, Oct 3-4, 2008

"Not A Basic Airway"

EMStock, Bledsoe Ranch, September 22-24, 2008

"Cyanide Poisoning"

"Excited Delirium"

Arkansas EMT Association Annual Conference, Hot Springs AK, August 7-9, 2008

"EMS Quality Improvement and Peer Review Fundamentals"

"Medical Director Liability"

"EMS Disciplinary Action and the Medical Director"

"Controversies in EMS"

Southern Louisiana EMS Conference, Panama City, FL, May 6-8, 2008

"Advances in CHF Treatment"

Region XI EMS, Ruidoso, NM, April 24-27, 2008

"The Basic Airway, Not So Basic"

"Advance in CHF Treatment"

Rhode Island EMS, April 28-30, 2008

"Advances in CFH Treatment"

EMS Today, Baltimore MD, March 28, 2008

"PCRF Clinical Controversies: Technology in assessment"

"Excited delirium-A life threatening condition"

"The basic airway: Not so basic!"

Duluth EMS Conference, January 28, 2008

"Clinical Controversies"

East Coast EMS Conference, Camden Maine, November 8, 2007

"Shock"

"All That Wheezes"

"Keynote - Where have all the Mentors gone?"

EMS Expo, Orlando, FL, September 2007

EMS Management Issues, Ask the Docs, Controversies of Intubation.

Georgia EMS Conference, Savannah GA, August 30, 2007

"All That Wheezes", "CPAP for Everyone",

Oklahoma EMS Conference, Enid OK, July 19th 2007

"Pre-hospital CPAP",

Arkansas EMS Conference, Hot Springs AR, July 21 2007

"Pre-hospital CPAP",

Alabama ACEP, Panama City FL, April 9th 2007

"Pre-hospital CPAP", "Documentation: What you never learned",

Louisiana EMS Conference, Baton Rouge LA, June 23rd 2007

"Pre-hospital CPAP"

NM Region II EMS "Partners for Life", Ruidoso NM, April 13th 2007

"Be Excellent to One Another"

"Rumbles and Grumbles"

Speaking EMS Today, Baltimore, MD March 8-11, 2007

"Writing a Good Narrative"

"The Mystery of the Med"

"Clinical Controversies - Prehospital Intubation",

"Where have all the Mentors Gone"

Emergency Care Conference, Columbus, Ohio, March 4, 2007

"Drowning on dry land"

Gathering of the Eagles, Dallas, TX, Feb 15th 2007

"CPAP for Basics"

"EMS Medical Director Liability"

"Zen and the Art of EMS"

Duluth EMS Conference, Duluth MN, January 2007

"Pre-hospital CPAP"

"Shock: More than low blood pressure"

National Association of EMS Physicians, Naples Florida, January 2007

"EMS Medical Director Liability"

Massachusetts State EMS Conference, Boston MA, October 2006

"Prehospital CPAP",

Tennessee Ambulance Association, Nashville TN, October 2006

"Prehospital CPAP"

Vital Signs, Syracuse NY, October 2006

"2005 AHA Guidelines: Why Change"

"CPAP for Everyone"

EMS Expo, Las Vegas NM, September 2006

"EMS Medical Oversight"

"Advances in ACLS & CPR - What do we do now?"

"ECG Interpretation for EMT-Basics"

Oregon EMS Conference 2006, Portland OR, September 2006

"All That Wheezes"

"Becoming an EMS Professional"

"Precon- Caring for the Geriatric Patient"

"Care of the Elderly Trauma Patient"

Nebraska EMS Statewide Conference, Lincoln NE, July 2006

"Shock – More than low blood pressure"

"Get Low, Go Slow - Care of the Pediatric Patient"

"Become an EMS Professional"

New Mexico EMS Conference, Albuquerque NM, July 2006

"The New 2005 AHA Guidelines"

"Become an EMS Professional"

"New Therapies for CHF"

26th annual Colorado Symposium on Emergency Care 2006, Telluride CO, May 2006

"New 2005 AHA Guidelines"

"Care of Elderly Trauma Victims"

"Advanced Treatment of CHF"

EMS Week, Albany Medical Center, Albany NY, May 2006

"The Bleeding Edge of EMS"

National Association of EMS Educators Annual Conference, San Antonio TX, September 2005

"Using Peer Review Constructively in EMS Education"

"EMS Mentoring and the Affective Domain"

ClinCon 2005, Orlando Florida, June 2005

"CPAP for Everyone"

"The New 2005 AHA Guidelines"

Texas EMS Conference, San Antonio TX, November 2004

"CPAP for Everyone"

Virginia State EMS Conference, Norfolk VA, November 2004

"All That Wheezes"

"CPAP for Everyone"

"Get Low, Go Slow - Pediatric Emergencies",

EMS Expo, Atlanta GA, October 2004

"All That Wheezes"

"Shocking truth about Shock"

EMS Stock, Midlothian TX, May 2004

"Advances in CHF Therapy"

EMS Today, Salt Lake City, March 2004

"Advances in CHF Therapy"

"Grow'n Old, Get'n Slow"

Michigan EMS Instructors Conference, Houghton Lake MI, October 2003

"Dealing with Gerneration X"

"EMS Documentation"

"Peer Review"

EMS Expo, Las Vegas NV, October 2003

"Grow'n Old, Gen't Slow - Caring for the Geriatric Patient"

"All That Wheezes"

Paramedic Seminars; Oshkosh WI; April 2003

"CPAP for Everyone"

Geneva Convention; Lake Geneva WI; February 2003

"Grow'n Old, Get'n Slow"

Geneva Convention; Lake Geneva WI; February 2003

"Get Low, Go Slow"

Geneva Convention; Lake Geneva WI; February 2002

"All That Wheezes"

"Understanding Shock"

Case 1:23-cv-00416-JPB-WEJ Document 15-3 Filed 03/16/23 Page 19 of 19

Working Together - WEMSA Annual Conference; Milwaukee WI; January 2001

"Advanced Life Support Skills for Basics",

Working Together - WEMSA Annual Conference; Milwaukee WI; January 1998

"EMS Peer Review"

Paramedic Seminars; Oshkosh WI; April 1997

"The New Intermediate Curriculum",

Working Together - WEMSA Annual Conference; Milwaukee WI; January 1996

"Diabetic Emergencies"

Working Together – WEMSA Annual Conference, Milwaukee WI; January 1995

"Medical Direction Workshop"

References

Dr. Daniel Hankins EMS Medical Director Mayo Transport Systems 200 First Street SW Rochester, MN 55905 USA (507) 255-4399 dhankins@mayo.edu

R. J. Frascone
EMS Medical Director
Regions Hospital
13801B
640 Jackson Street
Saint Paul, MN 55101-2595
651-778-0398
ralph.j.frascone@healthpartners.com

Dr. Mike McEvoy Clinical Associate Professor Albany Medical Center 33 Anchor Drive Waterford, NY 12188 518-383-8608

Dr. Carol Cunningham – Ohio State EMS Medical Director Division of EMS 1970 West Broad Street P.O. Box 182073 Columbus, Ohio 43218-2073 docmaynard@earthlink.net (440) 953-6128

Dr. Charles Cady – Former Wisconsin State Medical Director Medical College of Wisconsin Froedtert Hospital East 9200 W. Wisconsin Ave. Milwaukee, WI 53226 cccady@mcw.edu (414) 805-6451

Personal Interests

Spending time with my family, NASCAR, and Sailing